

**IN THE UNITED STATES DISTRICT COURT  
FOR THE WESTERN DISTRICT OF  
PENNSYLVANIA**

PENNSYLVANIA STATE	)	
CONFERENCE OF THE NAACP, et al.,	)	
	)	Civil Action No.: 1:22-cv-00339
Plaintiffs,	)	
	)	
v.	)	Judge Susan P. Baxter
	)	
LEIGH CHAPMAN,	)	
Acting Secretary of the Commonwealth, et	)	
al.	)	
	)	
Defendants.		

**RESPONSE IN OPPOSITION  
TO MOTION FOR SUMMARY JUDGMENT**

In Response to Plaintiffs’ Motion for Summary Judgment, the Defendant Westmoreland County Board of Elections (“Westmoreland”), by its undersigned attorney, joins in the response filed by Lancaster County Board of Elections (“Lancaster Board”) and incorporates by reference Lancaster Board’s response in opposition to Plaintiffs’ Motion for Summary Judgment.

All of the arguments asserted by Lancaster Board apply equally to Westmoreland. For all the reasons stated in Lancaster Board’s Response in Opposition to Plaintiffs’ Motion for Summary Judgment, Plaintiffs’ Motion for Summary Judgment should be denied.

Dated: May 5, 2023

Respectfully submitted,

/s/ Melissa A. Guidy  
Melissa A. Guidy, Esquire

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Westmoreland County Board of Elections

**CERTIFICATE OF SERVICE**

The undersigned hereby certifies that a true and correct copy of the foregoing Notice of Entry of Appearance was filed electronically and served via the Court's CM/ECF system, pursuant to the Federal Rules of Civil Procedure.

Respectfully submitted,

/s/ *Melissa A. Guiddy*

Melissa A. Guiddy, Esquire